

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Lenora L. Givens
Case No. 21-05530 Chapter 13

All Cases: Moving Creditor JPMorgan Chase Bank, N.A Date Case Filed April 27, 2021

Nature of Relief Sought ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____

Chapter 13: Date of Confirmation Hearing N/A or Date Plan Confirmed 07/30/2021

Chapter 7: ☐ No-Asset Report filed on _____
☐ No-Asset Report not filed. Date of Creditor's Meeting: _____

1. Collateral

- a. ☐ Home
- b. ☒ Car 2016 Chevrolet Malibu, VIN#1G1ZE5ST0GF256006
- c. ☐ Other (describe) _____

2. Balance Owed as of September 6, 2021: \$10,549.21
Total of all other Liens against Collateral: \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the Debtor(s) post-petition:

4. Estimated Value of Collateral (must be supplied in all cases) \$15,875.00, J.D. Power Used Cars/Trucks.

5. Default

- a. ☐ Pre-Petition Default
Number of months _____ Amount \$ _____
- b. ☒ Post-Petition Default
 - i. ☒ On direct payments to the moving creditor
Number of months 3 Amount \$1,308.68
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____

6. Other Allegations

- a. ☒ Lack of Adequate Protection 11 U.S.C. §362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☒ Rapidly depreciating asset
 - iv. ☐ Other _____
- b. ☐ No Equity and Not Necessary for an Effective Reorganization 11 U.S.C. §362(d)(2)
- c. ☐ Other "Cause" 11 U.S.C. §362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple filings
 - iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: 09/14/2021

Respectfully submitted,

/s/Edward H. Cahill

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Attorneys for Creditor

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